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Attorney For Defendants
Kook Jin Lee and
Southeast News, Inc., et al and
Donga Daily News, LLC, et al

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

The Dong-A Ilbo :
Plaintiff Civil Action No. 08-2399
v.

Bo H. Lim, et al :
Defendant
and

Kook Jin Lee, et al :
Defendant
and

The Korean Daily Tribune, Inc., et al :
Defendant
and

Southeast News, Inc., a/k/a :
The Korean Southeast News, et al
Defendant
and

Chosun Daily News, LLC d/b/a :
The Chosun Daily News - Atlanta,
d/b/a Donga Daily News, et al
Defendant :

ANSWER OF KOOK JIN LEE, SOUTHEAST NEWS, INC.
AND DONGA DAILY NEWS, LLC TO MOTION TO
MODIFY THE ORDER ENTERED SEPTEMBER 15, 2009 AND LIFT
THE AUTOMATIC STAY AS TO NON-DEBTOR DEFENDANTS

I. ARGUMENT:

The Defendants do not dispute that the automatic stay entered in connection with the bankruptcy petition filed by Defendant, Bo H. Lim, applies only to Mr. Lim and not to Defendants, Kook Jin Lee, Southeast News, Inc and Donga Daily News, LLC. Defendants, therefore, do not oppose the Motion to Lift the Automatic Stay as to the Non-Debtor Defendants in this action.

Nevertheless, as a consequence of the bankruptcy petition filed by Defendant, Lim, the only real defendants remaining in this case are Kook Jin Lee and his businesses, Southeast News, Inc. and Donga Daily News, LLC.

The claims against Defendant, Bo Hi Lim, are currently subject to the bankruptcy automatic stay and ultimately will be subject to his bankruptcy discharge. The claims against The Korean Daily Tribune, Inc. and STV Networks, Inc. are claims in name only, but are not material to this action. Neither company continues to operate and do business and neither company has assets which can be a source of recovery for plaintiff.

Defendant, Lim's two businesses remain as named defendants in this case solely to give Plaintiff an argument that the case has a nexus with the Commonwealth of Pennsylvania.

As a practical matter, the only remaining substantive claims in this action are the claims against the Georgia Defendants, Kook Jin Lee, Southeast News, Inc. and Donga Daily News, LLC.

It is, therefore, submitted to the court that once the automatic stay is lifted as to the non-debtor defendants, that this case should be dismissed and/or transferred to the State of Georgia or South Korea for further proceedings. Defendants' outstanding Motion to Dismiss is incorporated hereby as if set forth at length.

WHEREFORE, Defendants, Kook Jin Lee, Southeast News, Inc. and Donga Daily News, LLC, do not oppose the Motion to Lift the Automatic Stay as to the non-debtor defendants. Furthermore, Defendants request This Honorable Court to grant the Motion to Dismiss of Defendants, Kook Jin Lee, Southeast News, Inc. and Donga Daily News, LLC, once the automatic stay is lifted as to the co-defendants.

By:



David J. Averett, Esquire
Attorney for Defendants, Kook Jin Lee,
Southeast News, Inc. and
Donga Daily News, LLC.

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The Korean Southeast News, et al
Defendant

and :

Chosun Daily News, LLC d/b/a :
The Chosun Daily News - Atlanta,
d/b/a Donga Daily News, et al
Defendant :

**CERTIFICATE OF SERVICE OF ANSWER AND BRIEF OF KOOK JIN LEE,
SOUTHEAST NEWS, INC. AND DONGA DAILY NEWS, LLC TO MOTION TO
MODIFY THE ORDER ENTERED SEPTEMBER 15, 2009 AND LIFT
THE AUTOMATIC STAY AS TO NON-DEBTOR DEFENDANTS**

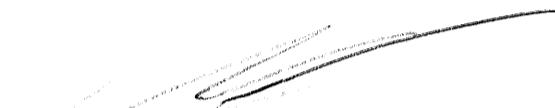
David J. Averett, Esquire, attorney for Defendants hereby certifies that he did serve a true and correct copy of the above Answer and Brief upon the following persons by regular mail on March 12, 2010 at the following addresses:

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By:



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